

Diversified Consultants, Inc.:

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Do counsel have full authority to settle at Rule 16 Conference? **Yes**

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? **March 16, 2015**

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure?
Plaintiff and Trans Union served their Initial Disclosures upon the parties on February 11, 2015.

Defendant Diversified Consultants will serve its Initial Disclosures prior to the Rule 16 Conference.

Does either side expect to file a case-dispositive motion? **Yes** (yes/no)

If yes, under what Rule: **Defendant Diversified may file a Rule 56 Motion for Summary Judgment.**

If yes, specify the issue:

Trans Union may file a Motion For Summary Judgment under Rule 56 regarding liability and damages.

Defendant Diversified Consultants: The issue will be whether the information it reported was false.

Proposed deadline for filing dispositive motions: **45 days after discovery deadline.**

Does either side anticipate the use of experts?

Plaintiff and Trans Union do not anticipate using an expert at this time.

Defendant Diversified Consultants does not anticipates using an expert at this time.

If yes, what is the proposed deadline for expert discovery?

Approximate date case should be trial-ready: **November, 2015**

Time for Plaintiff's case: 1- 2 days

Time for Defendant's case: **Trans Union: 1-2 days. Defendant Diversified Consultants: 1-2 days.**

Is a settlement conference likely to be helpful?

Early No (yes/no) After Discovery Yes (yes/no)

What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for final disposition? **The parties do not unanimously agree to proceed before a Magistrate Judge for final disposition.**

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 90 days.

2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to?

90 days

3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)?

Yes

4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan.

The parties may request the entry of a protective order to treat certain information produced in discovery as confidential.

5. If you contend the discovery period to exceed 90 days, please state reason: